

Brian Quiros

From: Tisa, Kimberly
Sent: Thursday, September 21, 2017 11:05 AM
To: Mike Zarba
Cc: Trombly, Gary; Tisa, Kimberly
Subject: CEC - Structural Steel Decontamination and Recycling - EPA Approval

Mr. Zarba:

EPA has received the following information pertaining to the demolition debris that is/was located on the Century Enterprise Center Site. The debris, which includes structural steel beams, was generated during the demolition of the site building and additional sampling was performed to confirm PCB concentrations for disposal. The information pertaining to the steel was submitted pursuant to Attachment 1, Condition 13 of the September 1, 2015 PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c). Documents provided to EPA on the debris, including the structural steel beams, include the following:

- September 22, 2016. *Strategic Environmental Services PCB Sampling Plan for CEC Structural Columns and Trusses.*
- October 4, 2016. *Email transmittal from Town of New Milford (M. Zarba) to EPA (K. Tisa). Truss and Column PCB Sampling Results.*
- October 5, 2016. *EPA (K. Tisa) notification to Town (M. Zarba) that steel beams were to be disposed as a \geq 50 ppm PCB waste unless otherwise sampled to determine disposal requirements. Determination based on fact that PCBs above regulatory thresholds were identified during truss/column sampling.*
- October 14, 2016. *Email transmittal from Town of New Milford (M. Zarba) to EPA (K. Tisa). SDS identified sample locations for paint sampling. Description, map, and photo-log for samples.*
- October 20, 2016. *Strategic Environmental Services PCB Remediation Waste Pilot Study.*
- November 9, 2016. *EPA (K. Tisa) comments to Town (M. Zarba) on PCB decontamination plan and that the results of the pilot study did not provide sufficient data/information to support proposed decontamination plan. Also requested that Town provide results of the SDS paint sampling results to EPA.*
- November 21, 2016. *Transmittal of SDS paint sampling results to EPA (K. Tisa) by SDS with Partners letter dated November 16, 2016.*
- December 9, 2016. *Proposed SIP Modification for management of concrete floor (included SDS PCB Workplan, Rev. 8, December 9, 2016; PCB Remediation Plan, Rev. 7 and Structural Steel Decontamination and Wipe Sampling Plan, Rev. 2, November 7, 2016). EPA approved 12/15/16 with condition requiring submittal of sand analytical data. The proposed modification also identified that additional sampling of the ACM pile would be conducted and that the structural steel would be temporarily re-located to the northern portion of the pad pending a decision by the Town on waste disposal.*
- January 12, 2017. *Transmittal of Results Summary Letter for PCB Sampling of ACM Debris Pile dated December 21, 2016. Based on these results, the Town indicated that the ACM Debris Pile would be disposed as non-friable ACM/Excluded PCB Product at Minerva, Waynesburg, OH.*
- March 2, 2017 *Proposed PCB Sampling Approach for Characterization of Paint on Structural Steel (includes SDS Structural Steel Decontamination and Wipe Sampling Plan, Rev. 3. November 14, 2016.)*

- April 13, 2017. M. Zarba to K. Tisa notifying EPA of intention to use Waste Management in NH as disposal facility for PCB bulk product waste with non-friable ACM and < 50 ppm PCB remediation waste. EPA acknowledged via email on April 19, 2017.
- April 19, 2017 Characterization of Paint on Structural Steel for the New Milford CEC Project and Request for Authorization to Recycle (received by EPA on 4/24/17).
- April 27, 2017 Results Summary Letter for PCB Sampling of Sand Filled Pits.
- May 1, 2017 Attachment 3 to April 19, 2017 submittal (received by EPA on May 2, 2017).
- May 4, 2017. EPA Comments on April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle.
- May 8, 2017. Email TRC (E. Doubleday) responses to EPA questions on Aroclor identified in floor caulk.
- May 24, 2017 Written Responses to EPA Comments dated May 4, 2017.
- July 20, 2017. Emails - EPA Comments on EMSL QC Data, selection of low pressure decontamination method, and sand pit status.
- July 28, 2017. Email transmittal Response to EPA comment on low pressure decontamination method and sand pit status.
- August 4, 2017. Email transmittal of EMSL QC Data for New Milford CEC Project samples.

In the April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle, TRC (on behalf of the Town) concluded that with exception of the 12"x4" steel I-beams that are coated with paint exhibiting greater than or equal to (\geq) 50 ppm PCBs, the majority of the structural steel would be classified as an *Excluded PCB Product* as defined at 40 CFR § 761.3. This conclusion was based primarily on the PCB sampling associated with the Stack 1 steel. To support this conclusion, in the May 24, 2017 Response to EPA comments (page 10 of 14), the Town proposed to implement an Inspection and Test Plan during dismantlement and decontamination of the stacks of structural steel. In summary, following decontamination of the steel, additional sampling of the paint would be conducted to confirm PCB concentrations in the paint are less than ($<$) 50 ppm. In addition, a visual observation of the disassembled steel would be made to ensure that all beam sizes (steel types) are captured in the sampling. This proposed paint sampling and visual inspection would be in addition to the post-decontamination wipe sampling proposed in the November 14, 2016 Rev. 3 Structural Steel Decontamination and Wipe Sampling Plan.

Based on EPA's review of all information provided, the proposed decontamination and sampling plan for structural steel generated during building demolition activities and currently stockpiled on the Site appears reasonable to remove adhered dust/dirt and to confirm PCB concentrations for disposal/recycling. EPA is approving the Town's request for the structural steel with the following conditions:

1. Except as otherwise authorized herein, the Town shall comply with all other requirements as specified in the EPA September 1, 2015 PCB Approval and any modifications thereto.
2. The Town and/or its contractor shall submit a revised PCB Work Plan to reflect the decontamination of the structural steel;
3. The Town and/or its contractor shall submit a revised Structural Steel Decontamination and Wipe Sampling Plan to incorporate the additional paint sampling as described in the May 24, 2017 Responses to EPA Comments;

4. All steel sections where a previous paint sampling result indicated ≥ 50 ppm PCBs, shall be disposed of a ≥ 50 ppm PCB waste in accordance with Condition 13(a)(ii) of the EPA September 1, 2015 PCB Approval and the PCB regulations at 40 CFR Part 761;
5. Prior to conducting the sampling of each disassembled/decontaminated stack, the Town shall provide to EPA and CTDEEP, its visual observations of the composition of the beam sizes present, including photo-documentation, and the number of PCB samples to be collected from each type of steel;
6. Prior to shipment of the waste off-site, the Town shall submit the PCB sample analytical results (paint and surface wipe samples) to both EPA and CTDEEP to support its proposed disposal/recycling with the name(s) of the disposal/recycling facility(ies) for the PCB wastes; and,
7. All decontamination waste generated during this work shall be disposed in accordance with Condition 14 of the EPA September 1, 2015 PCB Approval.

Should you have any questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator
USEPA
5 Post Office Square, Suite 100
Boston, MA 02109-3912

617.918.1527 (phone)
617.918.0527 (fax)
Tisa.Kimberly@epa.gov